

The purpose of an Integrated Impact Assessment is to evidence that Aberdeen City Council is meeting its legislative duties by assessing the potential impacts of its policies and decisions on different groups of people and the environment. The legislation considered within this assessment is:

- Section 2 [Equality Act 2010 protected characteristics](#)
- Section 3 [Socio-Economic](#)
- Section 4 [Consumer Duty](#)
- Section 5 [Human Rights](#)
- Section 6 [Children and Young People’s Rights](#)
- Section 7 [Environmental impacts](#)

The term ‘policy’ is used throughout this document and applies to policies, proposals, strategies, provision, criteria, functions, practice, budget savings and activities that includes delivery of our services.

## 1. About the Policy

<b>1.1 Title</b>
Reduce number of cleaning hours across all school buildings
<b>1.2 What does this policy seek to achieve?</b>
<p>This proposal would deliver an indicative budget saving of £600k per annum. The service is however, absolutely critical to the Council’s approach to infection control, particularly because of lessons learned from the COVID-19 pandemic and recovery, with the importance of effective cleaning paramount.</p> <p>The organisation would risk not meeting our statutory responsibilities within the Education (Scotland) Act, the Health &amp; Safety at Work Act and the Welfare at Work regulations.</p> <p>Schools would be noticeably less clean and there would be an increase in likelihood of bacteriological and/or viral infection transmission.</p> <p>It is unlikely that any large-scale reduction in employee numbers could be met through natural wastage, and therefore employees may be at risk of displacement as a result of reduced service levels.</p>
<b>1.3 Is this a strategic programme/proposal/decision?</b>
The proposal should be considered strategic and it will be considered at Full Council as part of the budget setting process for 2025/26.
<b>1.4 Is this a new or existing policy?</b>
Repeated from previous year’s budget proposals. Budget proposal was not taken by Council.
<b>1.5 Is this report going to a committee?</b>
Yes
<b>1.6 Committee name and date:</b>
Council, 05 March 2025
<b>1.7 Report no and / or Budget proposal number and / or Business Case reference number:</b>
OSM-06

## 1.8 Function and Cluster:

Corporate Landlord/Families & Communities

## Impacts

Aberdeen City Council has a legal requirement as a public sector organisation to assess the impact of its work on equality groups and assess against human rights, children's rights and our socio-economic duty. This is our Public Sector Equality Duty (PSED). The PSED has three key parts:

- Eliminate unlawful discrimination, harassment, victimisation or any other prohibited conduct.
- Advance equality of opportunity.
- Foster good relations by tackling prejudice, promoting understanding.

This following five sections in the Integrated Impact Assessment demonstrate that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

## 2: Equality Act 2010 - Protected Characteristics

Aberdeen City Council wants to ensure everyone is treated fairly. This section identifies what impact the policy may have on people with [protected characteristics](#).

2.1 What impact could this policy have on any of the below groups?

Protected Characteristic	Negative			Neutral	Positive
	High	Medium	Low		
<a href="#">Age</a>				X	
<a href="#">Disability</a>	X				
<a href="#">Gender Reassignment</a>				X	
<a href="#">Marriage and Civil Partnership</a>				X	
<a href="#">Pregnancy and Maternity</a>				X	
<a href="#">Race</a>				X	
<a href="#">Religion or Belief</a>				X	
<a href="#">Sex</a>	X				
<a href="#">Sexual Orientation</a>				X	

2.2 In what way will the policy impact people with these protected characteristics?

The option would negatively impact on any pupil, member of staff or visitor to our schools who may suffer from conditions that result in them having a suppressed immune system.

The Cleaning service staff group are predominantly female.

2.3 What considerations have been made in reaching the above assessment?

### What internal or external data has been considered? What does this data tell us?

Knowledge of the Cleaning Service workforce and of the customer base attending or visiting our schools.

Cleaning service staffing reports show that there are currently 460 employment contracts in Cleaning Services. 379 (82.4%) of those are held by female team members and 81 (17.6%) by male team members.

### What consultation and engagement has been undertaken with officers and partner organisations?

Chief Officers from all other services have had sight of all budget options being put forward.

## What consultation and engagement has been undertaken with people who may be impacted by this policy?

Aberdeen City Council undertook a two-part public consultation around the 2025/26 Budget and future spending plans from August 2024 to November 2024.

In Part 1, conducted throughout August 2024, participants were asked to provide feedback on four key areas: Budget Options, Council Tax, Service Area Prioritisation, and Capital Programme Expenditure. Under Budget Options, respondents were queried about the potential impacts of proposed options, including both reduction strategies and income-boosting charges. Regarding Council Tax, input was sought on acceptable levels of increase and their potential impacts. Citizens were also invited to express their views on which service areas should be prioritised for spending and to offer their opinions on capital programme expenditure.

In part 2, which took place throughout November 2024, the Council consulted on additional budget options, again focusing on the impact if implemented. The phase 2 consultation included budget options relating to the Aberdeen Health and Social Care Partnership.

There were 4278 responses across the four areas consulted on during part 1 of the online consultation and 1535 responses to part 2. Respondents had the option to indicate which protected characteristics would be affected.

**55% of respondents felt a reduction in cleaning provision at school would have a negative impact: 20% high, 17% medium, and 18% low. Meanwhile, 45% reported no impact.**

Various approaches were offered to support participation. Throughout both phases, opportunities were offered for the public to attend face to face and digital sessions to discuss the proposals in more detail. There were 2 face to face sessions, including British Sign Language options and 4 digital sessions, with a total of 24 attendees.

The option which this IIA relates to was included in the phase 1 consultation. In summary, opinion from those who responded to the consultation was as follows:

**Concerns about School Cleanliness:** Reducing cleaning services in schools was seen as a major health risk, potentially leading to the spread of germs and illnesses among students and staff.

**Importance of Cleaning Services:** There are significant worries about reducing cleaning hours in schools and other facilities, as this could lead to increased illness and a decline in hygiene standards.

**Health and Safety Concerns:** Reducing cleaning services is seen as a potential health risk, especially in the context of preventing the spread of diseases like COVID-19.

## 2.4 What mitigations can be put in place?

### What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Teaching/school support employees and pupils would need to undertake more self-cleaning to ensure that school buildings were clean and safe for occupation.

If the proposal was to be taken forward, a business case would be required which would be subject to full consultation with the employee group and Trade Union representatives. The intention would be for 'natural wastage' to be used to allow employees to naturally leave the organisation, and a review of currently vacant posts would also be undertaken. All employees are on city-wide contracts, so could be realigned to clean other properties to ensure that the 20% reduction was being equitably implemented across the school premises operational property portfolio.

With mitigations in place, what is the new overall rating of the negative impact(s)?

High	
Medium	X
Low	



### 3: Socio-Economic Impacts

Aberdeen City Council has a duty to reduce the inequalities of outcome that can arise from socio-economic disadvantage. This section is used to consider what impact the policy may have on people experiencing socio-economic disadvantage – and how any inequalities of outcome arising from the policy can be reduced.

Use this guide to understand more on socio-economic inequalities: [The Fairer Scotland Duty: Guidance for Public Bodies \(www.gov.scot\)](https://www.gov.scot/publications/fairer-scotland-duty/guidance-for-public-bodies/)

3.1 What impact could this policy have on people who experience the following aspects of socio-economic disadvantage?

	Negative	Neutral	Positive
<b>Low income</b> – those who have insufficient earnings to meet basic needs, such as food, clothing, housing, or utilities.	X		
<b>Low/ no wealth</b> – those who have no savings for unexpected spend or provision for the future.	X		
<b>Material deprivation</b> – those who cannot afford or access goods or services that are considered essential or desirable for a decent quality of life, such as food, clothing, heating, transport, internet, cultural, recreational and social activities.	X		
<b>Area deprivation</b> – those who live in an area with poor living conditions, such as higher levels of crime, pollution, noise, congestion, or lack of infrastructure, amenities, or green spaces.	X		
<b>Socio-economic background</b> – social class, parents’ education, employment, income.	X		

3.2 In what way will the policy impact people experiencing socio-economic disadvantage?

Option would affect some of our lowest paid employees, who will already be most impacted by the financial consequences of the pandemic and subsequent cost of living crisis. All employees are on the G4 point of the salary scale and the workforce is predominantly female.

3.3 What considerations have been made in reaching the above assessment?

#### What internal or external data has been considered? What does this data tell us?

We know from staffing reports that our workforce is predominantly female. We know from our salary scales that Cleaners are on the G4 salary scale.

#### What consultation and engagement has been undertaken with officers and partner organisations?

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#### What consultation and engagement has been undertaken with people who may be impacted by this policy?

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**Health and Safety Concerns:** Reducing cleaning services is seen as a potential health risk, especially in the context of preventing the spread of diseases like COVID-19.

### 3.4 What mitigations can be put in place?

#### What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Consultation would be undertaken with the employee group and Trade Union representatives. All employees affected by a reduction in service option could find themselves in a redeployment situation and would be supported in accordance with that process to find suitable alternative employment. It would be hoped that through natural wastage, vacancy management and realigning employees to clean other properties, no remaining employees will suffer financial detriment.

**If mitigations are in place, does this remove or reduce the negative impact?**

**No – negative impact remains**

X

**Yes – negative impact reduced**

**Yes - negative impact removed**

## 4: Consumer Impacts

The Consumer Scotland Act 2020 places a Consumer Duty on the public sector to put consumer interests at the heart of strategic decision-making, emphasising the need for accessible and affordable public services, especially during times of financial pressure. This person-centred approach is intended to result in better quality services and outcomes for the public as consumers of public services across Scotland.

This section of the IIA is used to consider the impact of the policy on consumers of any services that the policy is intended to change.

Use this guide to understand more on the consumer duty: [How to meet the consumer duty: guidance for public authorities](#)

### 4.1 What impact could this policy have on any of the below consumer groups?

	Negative	Neutral	Positive
<b>Individuals</b>	X		
<b>Small businesses</b>		X	

### 4.2 In what way will the policy impact people in these consumer groups?

Any reduction in service provision would have a negative impact on those who receive the service. The impact would potentially be felt most acutely if an outbreak of a bacteriological or viral infection was to be experienced, as the service would be less able to respond to that and the risk for the outbreak to spread more widely would be prevalent.

We would be unable to demonstrate that we would be applying the Safety consumer principle because the measures that we would have in place to protect our consumers from harm would not be adequate.

### 4.3 What mitigations can be put in place?

#### What can be done to remove or reduce any negative impacts of this policy (if applicable)?

Service reductions at premises which didn't have a live outbreak could be implemented, with resource moved to where the outbreak was being experienced. But this would place a heightened risk of outbreak at the other premises because of inadequate cleaning input.

**If mitigations are in place, does this remove or reduce the negative impact?**

No – negative impact remains

X

Yes – negative impact reduced

Yes - negative impact removed

## 5: Human Rights Impacts

The Human Rights Act 1998 sets out the fundamental rights and freedoms that everyone in the UK is entitled to. It incorporates the rights set out in the European Convention on Human Rights (ECHR) into domestic British law. The Human Rights Act came into force in the UK in October 2000

The Act sets out our human rights in a series of 'Articles'. Each Article deals with a different right.

Use this guide to understand more about [Human Rights](#).

### 5.1 What impact could this policy have on Human Rights?

Human Rights Article	Negative	Neutral	Positive
Article 2: <a href="#">Right to life</a>		X	
Article 4: <a href="#">Prohibition of slavery and forced labour</a>		X	
Article 5: <a href="#">Right to liberty and security</a>		X	
Article 6: <a href="#">Right to a fair trial</a>		X	
Article 7: <a href="#">No punishment without law</a>		X	
Article 8: <a href="#">Right to respect for private and family life, home and correspondence</a>		X	
Article 9: <a href="#">Freedom of thought, belief and religion</a>		X	
Article 10: <a href="#">Freedom of expression</a>		X	
Article 11: <a href="#">Freedom of assembly and association</a>		X	
Article 12: <a href="#">Right to marry and start a family</a>		X	
Article 14: <a href="#">Protection from discrimination in respect of these rights and freedoms</a>		X	
Article 1 of Protocol 1: <a href="#">Right to peaceful enjoyment of your property</a>	X		
Article 2 of Protocol 1: <a href="#">Right to education</a>	X		
Article 3 of Protocol 1: <a href="#">Right to participate in free elections</a>		X	

### 5.2 In what way will the policy impact Human Rights?

Cleaning is critical to ensure that our properties are clean and safe places for our citizens to live within, visit or work within.

Cleaning can be seen as an enabling service which ensures schools are clean and safe places to allow our children and young people to be taught in appropriate surroundings.

### 5.3 What mitigations can be put in place?

#### What can be done to remove or reduce any negative impacts of this policy (if applicable)?

School employees and pupils would need to undertake more self-cleaning to ensure that school buildings were clean and safe for occupation. This is likely to be met with significant opposition from staff groups and their Trade Union representatives, pupils and their parents/carers.

If mitigations are in place, does this remove or reduce the negative impact?	No – negative impact remains	X
	Yes – negative impact reduced	
	Yes - negative impact removed	



## 6: Children and Young People’s Rights Impacts

The United Nations Convention has 54 articles that cover all aspects of a child’s life and set out the civil, political, economic, social and cultural rights that all children everywhere are entitled to. It also explains how adults and governments must work together to make sure all children can enjoy all their rights.

Children’s rights apply to every child/young person under the age of 18 and to adults still eligible to receive a “children’s service” e.g. care leavers aged 18-26 years old.

You can [read the full UN Convention \(pdf\)](#), or [just a summary \(pdf\)](#), to find out more about the rights that are included.

### 6.1 What impact could this policy have on the rights of Children and Young People?

	Negative	Neutral	Positive
<b>PROVISION</b>			
Article 2: non-discrimination		X	
Article 3: best interests of the child provision and protection	X		
Article 5: parental guidance and a child's evolving capacities		X	
Article 16: right to privacy		X	
Article 17: access to information from the media		X	
Article 18: parental responsibilities and state assistance		X	
Article 22: refugee children		X	
Article 23: children with a disability		X	
Article 24: health and health services		X	
Article 26: social security		X	
Article 27: adequate standard of living		X	
Article 28: right to education	X		
Article 29: goals of education		X	
Article 30: children from minority or indigenous groups		X	
Article 31: leisure, play and culture		X	
Article 39: recovery from trauma and reintegration		X	
Article 40: juvenile justice		X	
<b>PROTECTION</b>			
Article 6: life, survival and development		X	
Article 7: birth registration, name, nationality, care		X	
Article 8: protection and preservation of identity		X	
Article 9: Separation from parents		X	
Article 10: family reunification protection		X	
Article 11: abduction and non-return of children		X	
Article 15: freedom of association		X	
Article 19: protection from violence, abuse and neglect		X	
Article 20: children unable to live with their family		X	
Article 21: adoption		X	
Article 25: review of treatment in care		X	
Article 33: drug abuse		X	
Article 34: sexual exploitation		X	
Article 35: abduction, sale and trafficking		X	
Article 36: other forms of exploitation		X	
Article 37: inhumane treatment and detention		X	
Article 38: war and armed conflicts		X	

<b>Article 32:</b> child labour		X	
<b>PARTICIPATION</b>			
<b>Article 12:</b> respect for the views of the child		X	
<b>Article 13:</b> freedom of expression		X	
<b>Article 14:</b> freedom of thought, belief and religion		X	
<b>Article 42:</b> knowledge of rights		X	

### 6.2 In what way will the policy impact the rights of Children and Young People?

Cleaning can be seen as an enabling service which ensures schools are clean and safe places to allow our children and young people to be taught in appropriate surroundings. They shouldn't be expected to actually undertake cleaning which allows that outcome to be achieved.

There would be concern that schools were not in a clean and safe enough condition to be opened to allow children and young people to receive the education to which they are entitled.

### 6.3 What mitigations can be put in place?

#### **What can be done to remove or reduce any negative impacts of this policy (if applicable)?**

School employees and pupils would need to undertake more self-cleaning to ensure that school buildings were clean and safe for occupation. This is likely to be met with significant opposition from staff groups and their Trade Union representatives, pupils and their parents/carers.

<b>If mitigations are in place, does this remove or reduce the negative impact?</b>	<b>No – negative impact remains</b>	X
	<b>Yes – negative impact reduced</b>	
	<b>Yes - negative impact removed</b>	

## 7: Environmental Impacts

Aberdeen City Council has a duty to meet its legal environmental responsibilities by working towards Net Zero emissions, adapting to climate change, and acting in a way it considers most sustainable. We must also fulfil the [biodiversity duty](#) and [sustainable procurement duty](#).

This section in the Integrated Impact Assessment demonstrates that these considerations that have been made in the policy, that the impact of proposals made is understood and accepted, and what mitigating steps can be taken to reduce any negative impact of the policy.

Use this guide to understand more on the legal climate change duty: [Climate change - gov.scot \(www.gov.scot\)](#) and find out more about how Aberdeen is adapting to Climate Change: [Aberdeen Adapts | Aberdeen City Council](#)

7.1 What is the impact of this policy on any of the below climate, environmental and waste considerations?

	Negative	Neutral	Positive
<a href="#">Council or City-wide carbon emissions</a>	X		
<a href="#">Active and sustainable travel</a>	X		
<a href="#">Facilities for local living</a>		X	
<a href="#">Resilience and adaptability</a> to flooding and weather events		X	
<a href="#">Biodiversity improvement</a> and <a href="#">wildlife/habitat connectivity</a>		X	
Water consumption and drainage			X
Pollution (air, water, noise, light and land contamination)		X	
Impact on resource use and <a href="#">waste</a>		X	
<a href="#">Sustainable procurement</a> of goods and services		X	

7.2 In what way will the policy impact the environment?

Many of our employees are employed to service premises which are within their locality. Reducing the availability of hours of work in premises may force employees to seek opportunities outwith their locality, and travel by vehicle to reach the place of work, having a negative impact on carbon emissions.

Cleaning less frequently may have positive impacts on water consumption.

7.3 What considerations have been made in reaching the above assessment?

### What internal or external data has been considered? What does this data tell us?

Knowledge of the Cleaning Service workforce servicing our schools.

Cleaning service staffing reports.

### What consultation and engagement has been undertaken with local groups, partner organisations, experts etc? Where required, identify any other environmental assessments that have been completed.

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**Health and Safety Concerns:** Reducing cleaning services is seen as a potential health risk, especially in the context of preventing the spread of diseases like COVID-19.

#### 7.4 What mitigations can be put in place?

<b>What can be done to remove or reduce any negative impacts of this policy (if applicable)?</b>		
Attempts would be made to ensure employees, where it is their wish, are employed to service premises which require little or no vehicular travel to reach.		
<b>If mitigations are in place, does this remove or reduce the negative impact?</b>	<b>No – negative impact remains</b>	X
	<b>Yes – negative impact reduced</b>	
	<b>Yes - negative impact removed</b>	

## 8: Sign Off

### **Any further positive or negative impacts on individuals or groups that have been considered?**

Any staffing impact will be subject to employee and trade union consultation, with final proposals adjusted based on the feedback received.

[Workforce Reduction, Restructure or Redesign](#) IIA provides information around the potential impact on the workforce and the mitigations in place.

### **Does the policy relate to the Council's [Equality Outcomes](#)? If yes, how.**

No

### **Overall summary of changes made to the policy as a result of impact assessment.**

No changes.

### **Outline how the impact of policy will be monitored.**

Through discussion with Premises Responsible Persons, Service Managers and Chief Officers.

### **If there are any remaining negative impacts after mitigation, what is the justification for why this policy should proceed.**

There is a requirement to ensure the Council sets a balanced budget, which requires difficult decisions to be taken and this includes proposals with negative impacts.

That being said, the service cannot justify this proposal going ahead, as the Cleaning Service is a critical enabling service, the importance of which is absolutely paramount.

We are statutorily bound to ensure that our workplaces and schools are adequately cleaned. If this option is taken, there is a high risk that we will breach the following legislation:

- 1) Health & Safety at Work etc. Act 1974 (particularly clause 2 e); and
- 2) Workplace (Health, Safety and Welfare) Regulations 1992 (particularly clause 9)

This option would require for employees to be redeployed or made redundant. As such, this IIA should be read in conjunction with [IIA Workforce Reduction, Restructure and Redesign](#)

<b>Assessment Author</b>	Andy Campbell
<b>Date</b>	31 Jan 2025
<b>Chief Officer</b>	Stephen Booth
<b>Date</b>	21 Feb 2025